## **REMARKS**

With entry of the requested amendments above, claims 2-3 and 6-15 remain in the application. No claim has yet been allowed.

The drawings were objected to for failure to show the "clip" and "key operated lock". The foregoing amendment cancels Claims 4 and 5 and this drawing objection can now be withdrawn.

Claims 6 was objected to under 35 U.S.C. §112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the invention. The objectionable language regarding "when the panel is in an open position" has now been deleted.

Claim 1 has been cancelled, with Claim 10 now written in independent form. Claim 10 essentially recites what the Applicant now considers to be his invention. In particular, an invention is found in a rotatably connected extraction panel which has incorporated therein electrically conductive grounding tabs.

Referring to the Applicant's drawings and specification more particularly, the grounding tabs 20 are located within a panel that serves as both a front panel for a circuit sled module as well as an extraction lever to permit the module to be extracted and inserted into an enclosure. As explained in the specification, the grounding tabs 20, preferably located on both of the sidewalls of the extraction lever, are used for electrically grounding a given front panel to the adjacent front panels of other circuit sled modules when a group of circuit sled modules are inserted into a tray 26.

Thus, despite the fact that the front panels are serving as extraction levers and therefore are moveable, when they are assembled in the tray 26 into a position as shown in Figures 3 and 4, they provide an electrically continuous front panel surface. They therefore provide an electromagnetically enclosed structure with the rest of the tray 26.

We agree with the Examiner that Reznikov, *et al.*, (U.S. Patent 6,378,965) does indeed disclose a panel that is usable as an extraction lever for a circuit module. We also agree that Varghese (U.S. Patent 5,896,273) discloses a chassis having at least one grounding tab (i.e., item 102 as shown in his Figures 2 and 3A-3B).

However, in Varghese, the grounding tabs are not positioned on the extraction lever.

Rather, they are an integral, fixed part of the chassis 10 itself. Varghese does not provide for front panel clips – and he certainly does not recognize how to provide a continuous ground plane surface in the front of a circuit board enclosure when the front panels are used as extraction levers as well.

The Varghese teaching of placing grounding tabs within a rear portion of fixed circuit board enclosure frame really falls quite short of Applicant's teaching to arrange grounding tabs on a movable, front extraction lever, such that they contact adjacent extraction levers.

Applicant was faced with the problem of how to provide a grounded surface for the front panels which are not only themselves movable, but also which do not necessarily contact a portion of the chassis. Varghese only teaches circuit boards having a fixed front faces 46 and does not teach or show extraction levers at all. He therefore certainly does not teach or suggest extraction levers having grounding tabs or that grounding tabs could be fitted with or to such an extraction lever.

Therefore, we find no suggestion in Varghese or Reznikov of how to provide grounding for moveable front panels that are also serving as a extraction levers. Indeed it is only the Applicant who teaches one to insert the clips on the extraction levers themselves.

Neither do any of the other references of record provide a solution to the problem recognized only by the Applicant.

We remind the Examiner that it is insufficient to simply find various bits and pieces of a structure from different prior art references and make a bold statement that it would be obvious to to combine them. The references themselves must teach the combination.

Amendments have therefore been made to all claims in the application to recite that electrically conductive grounding tabs on each panel are used for electrically connecting the panel to an adjacent panel.

All of the claims are therefore allowable over the prior art of record.

## **CONCLUSION**

In view of the above amendments and remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned at (978) 341-0036.

Respectfully submitted,

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Dated:

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## MARKED UP VERSION OF AMENDMENTS

## Claim Amendments Under 37 C.F.R. § 1.121(c)(1)(ii)

- 2. (Amended) The [panel] <u>module</u> of claim [1] <u>10</u> further comprising a fastener releasably locking the panel to the circuit sled module.
- 3. (Amended) The [panel] module of claim [2] 10 wherein the fastener is a screw attached to the panel.
- 6. (Amended) The [panel] module of claim [1] 10 wherein the panel serves as a lever for extracting the circuit sled module from the tray when the panel is in an open position.
- 7. (Amended) The [panel] module of claim [1] 10 further comprising at least one side wall having at least one hook extending from a portion of the side wall near the bottom of the panel.
- 8. (Amended) The [panel] module of claim [1] 10 wherein the circuit sled module comprises a hard disk drive.
- 9. (Amended) The [panel] <u>module</u> of claim [1] <u>10</u> further comprising vents in the front of the panel.
- 10. (Amended) [The panel of claim 1] A circuit sled module comprising:
  - a panel having a front, top, and a bottom side, the panel being rotatably connected to the circuit sled module;
  - at least one hook near the bottom of the panel engaging a catch of a tray when the panel is rotated into a closed position; and
    - the panel further comprising electrically conductive grounding tabs <u>for</u> electrically connecting the panel to an adjacent panel.

- 11. (Amended) The [panel] module of claim [1] 10 wherein when the panel is rotated away from the circuit sled module the bottom of the panel engages an outer surface of the catch and provides a force which disengages mating connectors.
- 12. (Amended) A [panel for a] circuit sled module comprising:

a panel having a front, top, and a bottom, the panel being rotatably connected to the circuit sled module; [and]

at least one hook near the bottom of the panel engaging a catch of a tray when the panel is in a closed position;

wherein the panel serves as a lever for extracting the circuit sled module from the tray when the panel is in an open position; and

wherein the panel further comprises electrically conductive grounding tabs for electrically connecting the panel to an adjacent panel.

13. (Amended) A [panel for a] circuit sled module comprising:

a panel having a front, top, bottom, and a left side wall and right side wall extending from the front;

holes in the side walls near the top of the panel, said holes receiving an axle connected to the circuit sled module, the panel rotating about an axis formed by the axle; [and]

at least one hook near the top of the panel engaging a catch of a tray when the panel is in a closed position; and

the panel further comprises electrically conductive grounding tabs for electrically connecting the panel to an adjacent panel.

14. (Amended) A method for extracting a circuit sled module from a tray comprising:

providing a circuit sled module having a front panel comprising a front, top, and a bottom, the panel being rotatably connected to the circuit sled module the panel having grounding tabs formed thereon;

rotating the front panel away from the circuit sled module until the bottom portion of the front panel engages a lip of a tray forcing the circuit sled module to be released from the tray; and

pulling on the front panel to extract the circuit sled module from the tray, and thus causing the grounding tabs to engage grounding tabs of an adjacent module.

15. (Amended) A method for inserting a circuit sled module into a tray comprising:

providing a circuit sled module having a front panel comprising a front, top, bottom, and at least one hook near the bottom of the panel engaging a catch of a tray when the panel is in a closed position, the panel being rotatably connected to the circuit sled module and having grounding tabs formed thereon;

inserting the circuit sled module into the tray; and

rotating the front panel toward the closed position until the at least one hook engages the catch of the tray, and thus causing the grounding tabs to engage grounding tabs of an adjacent module.